

CRIMINAL COMPLAINT  
(Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America	DOCKET NO.
v. Bryan Osiel Zaragoza-Vargas DOB: 2000; Mexican Citizen	MAGISTRATE'S CASE NO. 25-05740MJ
Complaint for a violation of Title 18, United States Code, §§ 922(a)(6) and 924(a)(2)	

**COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:**

On or about February 3, 2025, at or near Tucson, in the District of Arizona, **Bryan Osiel Zaragoza-Vargas**, in connection with the acquisition or attempted acquisition of a firearm, knowingly made a false statement and representation to USA Pawn and Jewelry, which was intended and likely to deceive the business as to a fact material to the lawfulness of a sale of a firearm by the business, licensed under the provisions of Chapter 44, Title 18, United States Code, with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the records of USA Pawn and Jewelry, in that **Bryan Osiel Zaragoza-Vargas**, in connection with the purchase or attempted purchase of a firearm, that is, one (1) Haskell Mfg, Inc. model JHP .45 caliber pistol, stated he had not been previously convicted of a felony when in fact he was; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:**

On February 3, 2025, **Bryan Osiel Zaragoza-Vargas** attempted to purchase one (1) Haskell Mfg, Inc. model JHP .45 caliber pistol bearing serial number X4151069 from USA Pawn and Jewelry, a federally licensed firearms dealer in Tucson, Arizona, licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code. In completing ATF Form 4473, required to be kept in the records of USA Pawn and Jewelry in connection with the purchase or attempted purchase of the firearm, **Zaragoza-Vargas** stated that he had not been convicted of a felony offense for which a judge could have imprisoned him for more than one year, when in fact he had been previously convicted of the felony offense of Second Degree Robbery for which was sentenced to three (3) years' incarceration. **Zaragoza-Vargas** also signed the form, certifying all the information he provided therein was true, correct, and complete. **Zaragoza-Vargas** knowingly made the false statement and representation to USA Pawn and Jewelry, which was intended and likely to deceive the business as to a fact material to the lawfulness of a sale of a firearm by a business.

Homeland Security Investigations Special Agents obtained copies of court documents from the Superior Court of the State of California, for the County of Los Angeles, showing that **Zaragoza-Vargas** was convicted of the offense of Second-Degree Robbery on September 9, 2019 and sentenced to serve three (3) years in prison.

**MATERIAL WITNESSES IN RELATION TO THE CHARGE:** N/A

DETENTION REQUESTED  Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT  JUSTIN A COWAN <small>Digital signature of JUSTIN A COWAN Date: 2025.03.26 13:33:18 -07'00'</small>
AUTHORIZED BY AUSA R. Arellano _____  RAQUEL ARELLANO _____ <small>Digital signature of RAQUEL ARELLANO Date: 2025.03.26 12:34:59 -07'00'</small>	OFFICIAL TITLE  HSI SA Justin Cowan
<b>Sworn by telephone</b> <u>x</u>	

SIGNATURE OF MAGISTRATE JUDGE <sup>1)</sup>  	DATE  March 26, 2025
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<sup>1)</sup> See Federal Rules of Criminal Procedure Rule 3, 4.1